

March 29, 2005

## VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary Federal Communications Commission 445 12<sup>th</sup> Street, S. W. Room TW-B204 Washington, D. C. 20554

Re: Sprint Nextel Merger

Dear Madam Secretary:

This letter is filed in support of the Sprint Nextel merger on behalf of both Pioneer Telephone Cooperative, Inc., and the Cellular Network Partnership, d/b/a Pioneer Cellular.

Pioneer Telephone Cooperative, Inc., is the largest telephone cooperative in the State of Oklahoma, and one of the largest telephone cooperatives in the United States of America. Pioneer Telephone Cooperative, Inc., was formed in 1953, at a time when rural Oklahoma residents had no telephone service. Today, Pioneer Telephone Cooperative, Inc., employs 540 people, it's service area covers 76 exchanges, 10,900 square miles and serves over 50,000 subscribers in 30 Oklahoma Counties throughout Rural Western Oklahoma.

Cellular Network Partnership d/b/a Pioneer Cellular, of which Pioneer Telephone Cooperative, Inc., is a majority partner, has been licensed to provide wireless cellular service throughout Western Oklahoma since 1988, and currently serves in excess of 34,000 subscribers.

As a result of a recent Strategic Roaming Agreement entered into with Sprint PCS, Pioneer Cellular will expand the scope of its footprint in Western Oklahoma, together with portions of Southern Kansas. Working in concert with our fellow Cellular Network Partners, KanOkla Telephone Association, South Central Communications and Hinton Cellular, this new, expanded coverage area will encompass an additional 25 counties in Western Oklahoma and 11 counties in Southern Kansas, representing a total population of

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246,869. One of the key components to the SRA Project is that Pioneer Cellular will be able to provide nationwide "home" roaming for its cellular customers, anywhere on the Sprint PCS CDMA network, while, at the same time, providing "home" roaming capability for Sprint PCS customers in the expanded Pioneer Cellular CDMA service network.

The service area of both Pioneer Telephone Cooperative, Inc., and Pioneer Cellular is predominately rural, with the economic base consisting primarily of agriculture, oil and gas, and service-based businesses. The business judgment that motivated Pioneer to enter in to a Strategic Roaming Alliance with Sprint was primarily based on providing an enhanced nationwide roaming network for our customers, which would provide our enstormers the ability to ream on the Sprint PCS Network and should generate additional revenue for both entities, which will in turn allow us to do our part in enhancing the value and viability of Rural America. We feel it is just as important for a person in Rural Oklahoma to have use of all the services their wireless phone can provide, as it is for a person who lives in a large metropolitan area, such as Oklahoma City. This SRA Alliance with Sprint PCS and the creation of additional Strategic Roaming Alliance Partners, will allow for economies of scale that enhance rural status and will allow us to provide attractive roaming rates to our customers.

We view the probable Sprint Nextel merger as a positive development for our company, as a combination of Sprint and Nextel would allow for more timely technological improvements in CDMA technology; and, at the same time, should result in the overall improvement of service quality, which would, by defirition, be of benefit to all of our customers, present and future, who utilize the roaming feature of cellular communications. The combined synergies of the Sprint Nextel merger would, in our opinion, overflow to rural wireless carriers, such as Pioneer, and be a direct benefit to our customers, and would assist us in our engoing efforts to continue to serve and support Rural America.

In summary, we are unequivocally in support of the proposed Sprint Nextel merger. It is our considered opinion that the public good, insolar as it relates to Rural America, would be served; therefore, we urge your favorable consideration and approval as soon as possible.

Richard Ruhl

General Manager

RR/a